



Louisville Metro Air Pollution Control District
850 Barret Avenue
Louisville, Kentucky 40204-1745



Title V Operating Permit

Permit No.: 146-97-TV (R1)

Plant ID: 564

Effective Date: 6/26/2013

Expiration Date: 6/30/2018

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

United Parcel Service, Inc.
911 Grade Ln
Louisville, KY 40213

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Application No. 27744

Application Received: 9/30/2005
9/30/2010
5/04/2012

Permit Writer: Diana Prentice

Administratively Complete: 11/30/2005

Public Notice Date: 2/7/2013

Proposed Permit Date: 2/7/2013
4/29/2013



Air Pollution Control Officer
June 26, 2013

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Title V Permit Revisions/Changes

Revision No.	Date of Reissuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	N/A	06/25/2000	N/A	Entire Permit	Initial issuance
R1	06/26/2013	02/07/2013	Renewal	Entire Permit	Renewal; incorporate STAR TAC requirements, construction permits 78-04-C, 111-08-C, 107-08-C, 108-08-C, 109-08-C, 110-08-C, 112-08-C, 318-08-C, 435-05-C, 123-02-C, 35442-12-C, and 35811-12-C. Note

Note: The District removed the following equipment permanently taken out of service on 3/8/13: E30, E33, E35, E38 (Emission Unit U9).

Abbreviations and Acronyms

APCD	- Louisville Metro Air Pollution Control District
BAC	- Background Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallon
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- hour
in	- inch
lbs	- pounds
l	- liter
LMAPCD	- Louisville Metro Air Pollution Control District
mm	- millimeter
MM	- million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
NSR	- New Source Review
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 (the Act) required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are: (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD or APCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations."

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit General Conditions define requirements that are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the General Conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The General Conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The owner or operator's Title V permit may include a current table of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16 section 1.23, as of the date the permit was proposed for review by U.S. EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.

Insignificant activities identified in District Regulation 2.02, section 2 shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State, and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1, and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually, or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification (Form 9400-O) directly to the EPA and to the District, as set forth in Regulation 2.16, section 4.3.5.4, at the following addresses:

*US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960*

*Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745*

This certification must be postmarked by April 15th of the year following the year for which the certification is being submitted, or other such due date as required by another applicable regulation.

3. **Compliance Schedule** - The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, they shall,

upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency;
 - ii. The permitted facility was at the time being properly operated;
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit; and
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08, section 1.3. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.6)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as District-Only Enforceable Conditions, all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)
10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6)
- If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA at the address shown in General Condition 35.b. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall:
- a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
 - b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, section 4.3.5.3.6)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours: (Regulation 2.16, section 4.3.2)
- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
 - b. Have access to and copy records required by this permit.
 - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All semi-annual compliance reports shall include the following certification statement per Regulation 2.16.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete."
- Signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 st through June 30 th	August 29 th
July 1 st through December 31 st	March 1 st

If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, section 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Termination and Revocation by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1 through 5.11.6. For purposes of section 5.11.1, substantial or unresolved noncompliance includes, but is not limited to:
 - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
 - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.3, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.12 shall be submitted to:

*Louisville Metro Air Pollution Control District
Room #205
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents that are specifically required to be submitted to EPA, as set forth in Regulation 2.16 sections 3.3 and 5.8.5 shall be mailed to EPA at:

***US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations And Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Minor Facility Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources

Regulation	Title
7.01	General Provisions (New Affected Facilities)

District Only Enforceable Regulations:

Regulation	
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.00	Standards for Toxic Air Contaminants and Hazardous air Pollutants, Definitions
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants, General Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

- a. Any facility having any refrigeration equipment that normally contains fifty (50) pounds of refrigerant or more must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added, according to 40 CFR 82.166;
- b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
- c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166;
- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for

that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;

- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40 CFR 82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

STAR Requirements

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 through 4
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

- a. The owner or operator shall submit with the notification of construction for any new emission unit the STAR EA Demonstration for all Category 1 through Category 4 TACs emitted from that emission unit.
- b. The owner or operator shall submit a *plant-wide* emissions-based EA Demonstration to the District showing compliance with the *plant-wide* EA goals of 7.5 for new and existing, 3.8 for all new combined, and 1.0 for each TAC from each process when a change occurs that increases emissions above *de minimis* or previously modeled values.
- c. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form located on the APCD website (<http://www.louisvilleky.gov/APCD>) may be used for determining BAC and *de minimis* values.

U1 Emission Unit Description: Hangar**U1 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.1.1, 3.2, & 3.3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3, 4, 5.1.1, 5.1.5, 6 & 7
40 CFR 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	63.11173, 63.11175, 63.11176, 63.11177

District Enforceable Regulations		
Regulation	Title	Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U1 Equipment:

U1 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E1	One (1) hangar composite parts repair booth/table	5.00	See S1.e	N/A	S1
		5.01			

U1 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
	clean room configuration. Make: Custom, Model: Custom, Installed: 1990.	5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.08	<20%		
		7.08	2.34 lbs/hr		
		7.59	See S1.a.ii.		
E2	One (1) paint booth in hangar area. Make: Binks, Model: N/A, Installed: 2002.	5.00	See S1.e	C1	S2
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.08	<20%		
		7.08	2.34 lbs/hr		
		7.25	See S1.a.i.		
		40 CFR 63 Subpart HHHHHH	See S1.d.i.		
E42	Hangar fire pump 1. Make: Cummins, Model: NT855F3. Installed: 1989.	5.00 5.01 5.02 5.20 5.21 5.22 5.23	See S1.e	N/A	N/A
E43	Hangar fire pump 2. Make: Cummins, Model: NT855F3. Installed: 1989			N/A	N/A
E44	Hangar fire pump 3. Make: Cummins, Model: NT855F3. Installed: 1989			N/A	N/A
E45	Hangar fire pump 4. Make: Cummins, Model: NT855F3. Installed: 1989			N/A	N/A
E46	Hangar fire pump 5. Make: Cummins, Model: NT855F3. Installed: 1989			N/A	N/A
E47	Hangar fire pump 6. Make: Cummins, Model: NT855F3. Installed: 1989			N/A	N/A

U1 Control Devices:

Control ID	Description	Performance Indicator	Range	Stack ID
C1	Paint booth panel filter	Efficiency	≥90%	S2

Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC**

i. For Emission Point E1:

The owner or operator shall not allow or cause the total VOC emissions from all facilities subject to Regulation 7.59 (Emission Point E1) to exceed 5 tons per year. (Regulation 7.59, section 5.2)

Or

If total VOC emissions from all facilities subject to Regulation 7.59 exceed 5 tons per year, no coating shall be used with a VOC content, as applied, in excess of the following limits during a calendar month averaging period: (Regulation 7.59, section 3.1)

Coating	VOC lb/gal	VOC kg/l
Clear coatings	4.3	0.52
Air-dried coatings	3.5	0.42
Extreme performance coatings	3.5	0.42
All other coatings	3.0	0.36

ii. For Emission Point E2:

The owner or operator shall not allow or cause the emissions of VOC to exceed 5 tons per year for Emission points E2 and E34. (Regulation 7.25, section 5.2)(See Comment 1)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity for Emission Points E1 and E2. (Regulation 7.08, section 3.1.1)

c. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for Emission Points E1 and E2. (Regulation 7.08, section 3.1.2) (See Comment 2)

d. **HAP** (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 3.116)

i. For Emission Point E2:

The owner or operator is required to comply with 40 CFR 63, Subpart HHHHHH before January 10, 2011. (See Comment 3)

- 1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. (40 CFR 63.11173 (e)(1)) (See Comment 4)
- 2) Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, are trained in the proper application of surface coatings. The training program must include, at a minimum, the items listed below: (40 CFR 63.11173 (f))
 - (a) A list of all current personnel by name and job description who are required to be trained; (40 CFR 63.11173 (f)(1))
 - (b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed below: (40 CFR 63.11173 (f)(2))
 - (i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. (40 CFR 63.11173 (f)(2)(i))
 - (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. (40 CFR 63.11173 (f)(2)(ii))
 - (iii) Routine spray booth and filter maintenance, including filter selection and installation. (40 CFR 63.11173 (f)(2)(iii))
 - (iv) Environmental compliance with the requirements of this subpart. (40 CFR 63.11173 (f)(2)(iv))
 - (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the

required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Specific Condition S1.d.i.2)(b) are not required to provide the initial training required by that paragraph to these painters.

- 3) All new and existing personnel, including contract personnel, must be trained by the dates specified below:
 - (a) All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. (40 CFR 63.11173 (g)(2)) (See Comment 3)
 - (b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. (40 CFR 63.11173 (g)(3))
- 4) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements: (40 CFR 63.11173 (e)(2))
 - (a) All paint booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. (40 CFR 63.11173 (e)(2)(I)) (See Comment 4)
 - (b) Paint booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. (40 CFR 63.11173 (e)(2)(ii))
 - (c) For a paint booth that is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure. (40 CFR 63.11173 (e)(2)(ii))

- (d) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray. (40 CFR 63.11173 (e)(2)(iv))
- 5) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. (40 CFR 63.11173 (e)(3)) (See Comment 5)
- 6) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. (40 CFR 63.11173 (e)(4)) (See Comment 6)
- ii. For Emission Point E1, the owner or operator shall not spray paint in the paint booth. (See Comment 10)
- iii. See Appendix A for plantwide HAP standards.
- e. **TAC**
 - i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)(See Comment 8)
 - ii. The owner or operator shall not allow or cause the emissions of formaldehyde from Emission Point E1 to exceed de minimis. (Regulation 5.21)(Sees Comment 7 and 8)
 - iii. The owner or operator shall not allow or cause the emissions of hexavalent chromium from Emission Point E2 to exceed 0.688 pounds per year. (Regulation 5.21)(See Comments 7 and 8)
 - iv. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

i. For Emission Point E1:

- 1) An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)
 - (a) The regulation and section number applicable to the affected facility for which the records are being maintained,
 - (b) The application method and substrate type (metal, plastic, etc.),
 - (c) The amount and type of coatings (including catalyst and reducer for multicomponent coatings) and solvent (including exempt compounds) used at each point of application monthly.
 - (d) The VOC content as applied in each coating and solvent,
 - (e) The date for each application of coating and solvent,
 - (f) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used monthly.
- 2) The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
- 3) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc.

ii. For Emission Points E2 and E34, the owner or operator shall calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month to demonstrate compliance with limits in S1.a.ii.

iii. For Emission Point E1, the owner or operator shall calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month to demonstrate compliance with limits in S1.a.i.

b. **Opacity**

For Emission Points E1 and E2:

- i. The owner or operator shall inspect the filters in the paint booth(s) at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

c. **PM**

See Specific Condition S2.b.

d. **HAP**

- i. For Emission Point E2, records shall be kept of the following: (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 3.116)
 - 1) Certification that each painter has completed the training specified in Specific Condition S1.d.ii with the date the initial training and the most recent refresher training was completed. (40 CFR 63.11177 (a))
 - 2) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in Comment 4. (40 CFR 63.11177 (b))
 - 3) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in Comment 4. (40 CFR 63.11177 (c))
 - 4) Copies of any notification submitted as required by Specific Condition S3.d (40 CFR 63.11177 (d))
 - 5) Records of any deviation from the requirements in Specific Condition S1.d. and Specific Condition S3.d. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. (40 CFR 63.11177 (g))
- ii. See Appendix A for plantwide HAP monitoring and record keeping requirements.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- iii. The owner or operator shall monitor and maintain the following records of each coating that contains formaldehyde for Emission Point E1:
 - 1) The coating name and product code number.
 - 2) The quantity (in gal) of coating applied during calendar month.
 - 3) The pounds per gallon of formaldehyde in the coating, as applied.
 - 4) Calculations that show the total pounds of formaldehyde emitted during each calendar month.
- iv. The owner or operator shall monitor and maintain the following records of each coating that contains hexavalent chromium for Emission Point E2:
 - 1) The coating name and product code number.
 - 2) The quantity (in gal) of coating applied during calendar month.
 - 3) The pounds per gallon of hexavalent chromium in the coating, as applied.
 - 4) Calculations that show the total pounds of hexavalent chromium emitted during each calendar month.
- v. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 9)

a. **VOC**

For Emission Points E1 and E2:

- i. Emission Unit and Emission Point ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. The monthly and twelve consecutive month VOC emissions for both emission points in this emission unit.
- iv. Any exceedances in emission limits. If none, the owner or operator shall submit a negative declaration.
- v. Identification of any deviation from monitoring and record keeping requirements. If none, the owner or operator shall submit a negative declaration.
- vi. Identification of any noncompliant coatings used including the quantity of excess emissions; and
- vii. Description of any corrective action taken. If no corrective action was taken during the reporting period, the owner or operator shall submit a negative declaration.

b. **Opacity**

For Emission Points E1 and E2:

- i. Emission Unit, Emission Point ID, and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each filter inspection conducted; and
- iv. Description of any corrective action taken pursuant to Specific Condition S2.b.i.

c. **PM**

See Specific Condition S3.b.

d. **HAP**

- i. For Emission Point E2: (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 3.116)

Annual Notification of Changes Report:

The owner or operator is required to submit a report in each calendar year in which information previously submitted in either the initial notification, Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in Specific Condition S1.d. on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information: (40 CFR 63.11176 (a))

- 1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. (40 CFR 63.11176 (a)(1))
- 2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. (40 CFR 63.11176 (a)(2))

- ii. See Appendix A for plantwide HAP reporting requirements.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to

the District within 6 months of a change of a raw material as described in S2.c.ii.

- iv. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. Equipment subject to Regulation 7.25 and a plantwide 5 tpy VOC limit:

Emission Unit	Emission Point	Description
U1	E2	One (1) paint booth in hangar area. Make: Binks, Model: N/A, Installed: 2002.
U9	E34	Zyglo NDT System, Model: ZL-67.

2. Using the minimum spray gun transfer efficiency of 35%, the percent solids of the material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.
3. The owner or operator was required to comply with 40 CFR 63, Subpart HHHHHH before January 10, 2011. The source submitted the required initial compliance notification on March 10, 2011.
4. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see 40 CFR 63.14). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non- HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
5. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see 40 CFR 63.14). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).
6. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without

atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

7. Based on Tier 3 (Screen3) air dispersion modeling using the emission limits specified in this permit, the carcinogenic risk for each Category 1 TAC is below 1.0 for non-industrial property and below 10.0 for industrial property with the emission limits specified in this permit. The carcinogenic risk for all Category 1 TACs for all processes is below 7.5 for nonindustrial property and below 75.0 for industrial property. The following Table represents the Carcinogenic Risk or EAG_C for each Category 1 TAC based on the maximum off-site concentration predicted from the Screen3 air dispersion modeling runs. Since the maximum off-site Carcinogenic Risk meets the more stringent non-industrial R_C of < 1.0 for individual process/process equipment and the plant-wide cumulative risk is < 7.5 , the source has demonstrated compliance with the EA Goals for all Category 1 TACs. Category 2 TACs are de minimus at their potential.

Emission Point	TAC	Maximum Concentration ($\mu\text{g}/\text{m}^3$)	Risk resulting from maximum off-site concentration
E2	Cr^{6+}	8.0×10^{-5}	0.963
Miscellaneous Non-Point Sources	Cd	0.000548	0.976
	Cr^{3+}	0.228	0.045
	Cr^{6+}	0.0000827	0.996
	CCl_4	0.067	1.0
Facility-wide R_C			3.93

8. The limit of 0.688 pounds per year of hexavalent chromium was obtained from the maximum concentration of $0.0000827 \mu\text{g}/\text{m}^3$ which still ensures a risk less than 1.0.
9. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.
10. The source submitted notification on March 8, 2013 that spray painting was no longer performed in the Emission Point E1 booth; therefore 40 CFR 63, Subpart HHHHHH is no longer applicable to that emission point.

U3 Emission Unit Description: Ground Support Equipment (GSE)**U3 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
6.44	Standards of Performance for Existing Commercial Motor Vehicle and Mobile Equipment Refinishing Operation.	1, 2, 3, 4
7.08	Standards of Performance for New Process Operations	1, 2, 3, 5
40 CFR 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	63.11173, 63.11175, 63.11176, 63.11177

District Enforceable Regulations		
Regulation	Title	Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U3 Equipment:

U3 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E4	Paint Booth. Make: JBI, Model: 754-PSB Special, Installed: 1988.	5.00	See S1.e	C2	S2
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		6.44	See S1.a.i		
		7.08	<20%		
		7.08	2.34 lbs/hr		
		40 CFR 63, Subpart HHHHHH	See S1.d.i		

U3 Control Devices:

Control ID	Description	Performance Indicator	Range	Stack ID
C2	Paint Booth Filter	Efficiency	≥90%	S2

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)

a. VOC

i. The owner or operator shall limit the VOC content in the coating materials as the following:

1) No coating shall be used with a VOC content, as applied, in excess of the following limits, unless the conditions of S1.a.i.2) are met: (Regulation 6.44, section 4.1)

(a) For Group I vehicles:

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	4.8	0.58
Primer sealer	4.6	0.55
Topcoat	5.2	0.62
Metallic/iridescent topcoat	5.2	0.62
Extreme performance	6.2	0.74

(b) For Group II vehicles:

Coating	VOC lb/gal	VOC kg/l
Pretreatment wash primer	6.5	0.78
Precoat	5.5	0.66
Primer/primer surfacer	2.8	0.34
Primer sealer	3.5	0.42
Topcoat	3.5	0.42
Metallic/iridescent topcoat	3.5	0.42
Extreme performance	6.2	0.74

2) The limitations of VOC content in S1.a.i.1) shall not be exceeded unless: (Regulation 6.44, section 4.3)

(a) Emissions are controlled to an equivalent level by air pollution control equipment,

- (b) The efficiency of the control equipment is a minimum of 85%, and
 - (c) The control equipment has been approved by the District and permits issued.
- 3) Specialty coatings shall not be applied unless: (Regulation 6.44, section 4.4)
 - (a) The VOC content is equal to or less than 7.0 pounds of VOC per gallon of coating, as applied, and
 - (b) The application of all such coatings, except safety related coatings, shall not exceed 10% of all coatings applied, on a weekly basis.
- 4) Surface cleaners, consisting of general wiping cleaners, solvents, wax removers, grease removers, road-tar removers, mold-release agent removers, and other similar materials, must meet the following requirements: (Regulation 6.44, section 4.5)
 - (a) General purpose surface cleaners shall have a VOC content that does not exceed 1.7 pounds per gallon, and
 - (b) Any cleaner, solvent, or remover material may be used for specific, hard to clean surfaces provided that: (Regulation 6.44, section 4.5)
 - (i) Material is dispensed from a hand-held spray bottle, and
 - (ii) Usage of the solvent or cleaner does not exceed 35% of the total monthly usage of all surface cleaners.
- ii. Spray gun cleanup shall be accomplished in an apparatus specifically designed to minimize evaporation of VOC materials to the atmosphere. (Regulation 6.44, section 7.5)
- iii. Spraying solvent through guns with no reasonable attempt to reclaim the used solvent is prohibited. (Regulation 6.44, section 7.5)
- iv. Good housekeeping practices shall be employed to minimize evaporation of solvent to the atmosphere. (Regulation 6.44, section 7)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. **PM**

- i. All spraying area or spray booth exhaust shall pass through filters or a filtering system that has a minimum efficiency of ninety percent (90%) on particulates. Efficiency shall be verified by the manufacturer's rated efficiency or other means approved by the District. (Regulation 6.44, section 5.1.1)
- ii. Spraying equipment shall have a minimum transfer efficiency of sixty-five percent (65%) at eight inches (8") from the work surface. (Regulation 6.44, section 5.4)
- iii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2)

d. **HAP** (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 4.116)

- i. The owner or operator is required to comply with 40 CFR 63, Subpart HHHHHH before January 10, 2011. (See Comment 3)
 - 1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. (40 CFR 63.11173 (e)(1)) (See Comment 3)
 - 2) Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, are trained in the proper application of surface coatings. The training program must include, at a minimum, the items listed below: (40 CFR 63.11173 (f))
 - (a) A list of all current personnel by name and job description who are required to be trained; (40 CFR 63.11173 (f)(1))
 - (b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed below: (40 CFR 63.11173 (f)(2))
 - (i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. (40 CFR 63.11173 (f)(2)(i))

- (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. (40 CFR 63.11173 (f)(2)(ii))
 - (iii) Routine spray booth and filter maintenance, including filter selection and installation. (40 CFR 63.11173 (f)(2)(iii))
 - (iv) Environmental compliance with the requirements of this subpart. (40 CFR 63.11173 (f)(2)(iv))
 - (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Specific Condition S1.d.ii.2) are not required to provide the initial training required by that paragraph to these painters.
- 3) All new and existing personnel, including contract personnel, must be trained by the dates specified below:
- (a) All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. (40 CFR 63.11173 (g)(2))
 - (b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. (40 CFR 63.11173 (g)(3))
- 4) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements: (40 CFR 63.11173 (e)(2))

- (a) All paint booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. (40 CFR 63.11173 (e)(2)(I))
 - (b) Paint booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. (40 CFR 63.11173 (e)(2)(ii))
 - (c) For a paint booth that is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure. (40 CFR 63.11173 (e)(2)(ii))
 - (d) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray. (40 CFR 63.11173 (e)(2)(iv))
- 5) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. (40 CFR 63.11173 (e)(3))
- 6) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. (40 CFR 63.11173 (e)(4)) (See Comment 5)
- ii. See Appendix A for plantwide HAP standards.
- e. **TAC**
 - i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established

by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)

- ii. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. VOC

Any person subject to this regulation shall comply with the following requirements as a minimum. The owner or operator shall maintain: (Regulation 6.44, section 8)

- i. A current list of all coatings, solvents, reducers, additives, and any other VOC containing material in use at the facility. This list shall include, but is not limited to, the following information:
 - 1) Name and appropriate identification of coating, catalyst, hardener, reducer, etc. used;
 - 2) Mix ratio of components used, and
 - 3) VOC content of coating, as applied, less water and excluded solvents, in pounds per gallon.
- ii. Monthly records that shall include (Regulation 1.05, section 4):
 - 1) Identification of applied coatings according to Specific Condition S2.a.i.1),
 - 2) Quantity of each coating applied, and
 - 3) Designation of each vehicle painted as either Group I or Group II.
- iii. Monthly records that shall include:
 - 1) Type of solvent used for cleanup or surface preparation, and
 - 2) Quantity of each solvent, cleaner, etc. used.
- iv. MSDS or other data sheets provided by the material manufacturer or its agent for each item listed in Specific Condition S2.a.i.1) and shall include as a minimum:

- 1) Designation of VOC content as supplied, expressed in lbs/gal, less water and excluded solvents,
- 2) Designation of all hazardous and/or toxic components. Designation shall include, as a minimum: the CAS registration number of the component; the weight percent of the component; and the weight of the product, expressed in lbs/gal, or alternately, the specific gravity of the product, and
- 3) Other pertinent physical and chemical data necessary to determine compliance with District regulations.

b. **Opacity**

See Specific Condition S2.c.

c. **PM**

- i. The owner or operator shall inspect the filters in the paint booth(s) at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

d. **HAP** (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 3.116)

- i. Certification that each painter has completed the training specified in Specific Condition S1.d.ii. with the date the initial training and the most recent refresher training was completed. (40 CFR 63.11177 (a))
- ii. Documentation of the filter efficiency of any spray booth exhaust filter material. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see 40 CFR 63.14). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non- HVLV) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. (40 CFR 63.11177 (b))

- iii. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see 40 CFR 63.14). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.). (40 CFR 63.11177 (c))
 - iv. Copies of any notification submitted as required by Specific Condition S3.c.i (40 CFR 63.11177 (d))
 - v. Records of any deviation from the requirements in Specific Condition S1.d and Specific Condition S3.c.i. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. (40 CFR 63.11177 (g))
 - vi. See Appendix A for plantwide HAP monitoring and record keeping requirements.
- e. **TAC**
- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
 - ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
 - iii. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 7)

a. VOC

- i. Emission Unit and Emission Point ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. Any exceedances in emission limits. If none, the owner or operator shall submit a negative declaration.
- iv. Identification of any deviation from monitoring and record keeping requirements. If none, the owner or operator shall submit a negative declaration.
- v. Identification of any noncompliant coatings used including the quantity of excess emissions; and
- vi. Description of any corrective action taken. If no corrective action was taken during the reporting period, the owner or operator shall submit a negative declaration.

b. Opacity

See Specific Condition S3.c.

c. PM

- i. Emission Unit and Emission Point ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
- iv. Description of any maintenance performed on the Dry Media Filter system, or any corrective action taken. If no maintenance or corrective action was performed during the reporting period, the owner or operator shall submit a negative declaration.

d. **HAP** (40 CFR 63, Subpart HHHHHH and Regulation 5.02, section 3.116)

i. Annual Notification of Changes Report:

The owner or operator is required to submit a report in each calendar year in which information previously submitted in either the initial notification, Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in Specific Condition S1.d on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information: (40 CFR 63.11176 (a))

- 1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. (40 CFR 63.11176 (a)(1))
- 2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. (40 CFR 63.11176 (a)(2))

ii. See Appendix A for plantwide HAP reporting requirements.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in

S2.c.ii

- iv. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. The requirement to use HVLP spray gun per 40 CFR 63, Subpart HHHHHH will assure ongoing compliance with the requirement to achieve a 65% transfer efficiency in accordance with Regulation 6.44.
2. The requirement to achieve 98% filter efficiency per 40 CFR 63, Subpart HHHHHH will assure ongoing compliance with the requirement to achieve a 90% filter efficiency in accordance with Regulation 6.44.
3. The owner or operator was required to comply with 40 CFR 63, Subpart HHHHHH before January 10, 2011. The source submitted the required initial compliance notification on March 10, 2011.
4. Using the minimum spray gun transfer efficiency of 35%, the percent solids of the material (45.9%), and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booth cannot be exceeded.
5. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.
6. The District determined on November 2, 2012 that the TAC compounds in this emission unit are de minimis.
7. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U4 Emission Unit Description: Fuel Farm**U4 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8
40 CFR 60 Subpart Kb	Federal New Source Performance Standards for VOC Liquid Storage Vessels	60.113(b), 60.115(b) and 60.116(b)
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	60.4205, 60.4207, 60.4210, 60.4211
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)	63.6603, 63.6605, 63.6625, 63.6640

District Enforceable Regulations		
Regulation	Title	Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards	1 through 5

U4 Equipment:

U4 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E6	Jet-A Tank (500,000 gal). Installed: 1985.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		
	40 CFR 60 Subpart Kb	N/A			
E7	Jet-A Tank (230,000 gal). Installed: 1983.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		
	40 CFR 60 Subpart Kb	N/A			
E8	Jet-A Recovery Tank (3,000 gal). Installed: 1994.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		
E9	Jet-A Dispensing. Installed: 1983	5.00	See S1.g	N/A	Fugitive
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		
E26	Jet-A Tank (1,000,000 gal). Installed: 2002.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		

U4 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
		40 CFR 60 Subpart Kb	N/A		
E27	Jet-A Tank (1,000,000 gal). Installed: 2002.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.i		
		40 CFR 60 Subpart Kb	N/A		
E48	East Fuel Farm Generator. Make: Caterpillar, Model: LC6. Installed: 2008.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		40 CFR 60 Subpart IIII	See S1.a.ii, S1.c, S1.d.i, S1.e, S1.f		
		40 CFR 63 Subpart ZZZZ	S1.c		
E49	West Fuel Farm Generator. Make: Cummins, Model: NTTA855GS2. Installed: 1989.	5.00	See S1.g	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			

U4 Control Devices:

There are no control devices associated with this unit.

Specific Conditions

S1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC**

- i. For Emission Points E6, E7, E8, E9, E26, and E27, the owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in storage vessels in this emission unit. (Regulation 7.12, section 3.1)(40 CFR 60 Subpart Kb)(See Comment 1)
- ii. For Emission Point E48, the owner or operator shall limit the total emissions of VOC and NO_x combined to 4.0 g/kW-hr. (40 CFR 89.112)(See Comment 2)

b. **HAP**

- i. For Emission Point E48, the owner or operator shall limit the operation to one hundred (100) hours in any calendar year for maintenance and testing. In addition, the owner or operator may operate up to 50 hours for non-emergency situations, but those hours must be counted towards the 100 hours per year for maintenance and testing. There is no time limit for use in emergency situations. (40 CFR 60.4211(f)) (Regulation 2.03, section 5.1)
- ii. See Appendix A for plantwide HAP standards.

c. **Unit Operation**

For Emission Point E48, the owner or operator shall purchase an engine certified to the emission standards in §60.4205(b), as applicable for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. (40 CFR 60.4211(c))

d. **NO_x**

- i. The owner or operator shall limit the total emissions of VOC and NO_x combined from Emission Point E48 to 4.0 g/kW-hr (40 CFR 89.112)
- ii. See Appendix C for plantwide NO_x standards.

e. **PM**

The owner or operator shall limit the emissions of PM from Emission Point E48 to 0.2 g/kW-hr. (40 CFR 89.112)(See Comment 2)

f. **Opacity**

The owner or operator must limit visible emissions from Emission Point E48 to 20 percent opacity during the acceleration mode, 15 percent during the lugging mode, and 50 percent during the peaks in either the acceleration or lugging modes. (40 CFR 89.113)

g. **TAC**

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)(See Comment 3)
- ii. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. **Monitoring and Recordkeeping** (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

a. **VOC**

- i. The owner or operator of Emission Points E6, E7, E8, E9, E26, and E27 shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.a.i.
- ii. The owner or operator shall keep a record that shows if Emission Points E6, E7, E8, E9, E26, and E27 are equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.
- iii. The owner or operator shall demonstrate compliance with the VOC and NO_x combined emission standard for Emission Point E48 in S1.a.ii by keeping records from engine manufacturer indicating compliance with the standards. (See Comment 2)

b. **HAP**

- i. For Emission Point E48:
 - 1) The owner or operator shall record, on the first working day after the end of each month, the unit's running time meter reading, and calculate (by difference) and record, the unit's operating time for

the previous month, to the nearest tenth of an hour, for compliance with the annual hourly time standard of Specific Condition S1.a.ii.

- 2) As a back-up to Specific Condition **Error! Reference source not found.**1), the owner or operator shall, when needed, manually record, monthly, the number of hours the unit was operated that month. For days during the month on which the unit was not operated, a monthly record shall be made of each day that the unit did not run (DNR).
- 3) The owner or operator shall calculate and record monthly, the monthly and calendar year total hours of operation of the unit.
- 4) The owner or operator shall change oil and filter every 500 hours of operation or annually, whichever comes first. (40 CFR 63.6603(a) and Table 2d)
- 5) The owner or operator may utilize an oil analysis program in order to extend the specified oil change requirement of 40 CFR 63.6603 Table 2d: (40 CFR 63.6625(i))
 - (a) The oil analysis must be performed at the same frequency specified for changing the oil.
 - (b) At a minimum, the following three parameters must be analyzed: Total Base Number, viscosity, and percent water content.
 - (c) When the Total Base Number is less than 30 percent of the Total Base Number of the oil when new, the viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or the percent water content (by volume) is greater than 0.5, the owner or operator is required to change the oil within 3 days or receiving the results of the analysis. (If the engine is not in operation when the results are received, the owner or operator must change the oil within 2 days or before commencing operation, whichever is later.)
 - (d) The owner or operator must keep records of the parameters that are analyzed, the results of the analysis, and the oil changes.
 - (e) The analysis program must be part of the maintenance plan for the engine.

- 6) The owner or operator shall inspect each air cleaner every 1,000 hours of operation or annually, whichever comes first. (40 CFR 63.6603(a) and Table 2d)
- 7) The owner or operator shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63.6603(a) and Table 2d)
- 8) The owner or operator shall keep records of the following for the unit: (40 CFR 63.6655)
 - (a) The occurrence and duration of each malfunction;
 - (b) Performance tests and performance evaluations;
 - (c) All required maintenance performed on the control and monitoring equipment;
 - (d) Actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process, control, and monitoring equipment to its normal manner of operation.

- ii. See Appendix A for plantwide HAP monitoring and record keeping requirements.

c. **Unit Operation**

For Emission Point E48: See Specific Condition S2.b.i(1, 2, & 3).

d. **NO_x**

- i. The owner or operator shall demonstrate compliance with the VOC and NO_x combined emission standard for Emission Point E48 in S1.d.i by keeping records from engine manufacturer indicating compliance with the standards. (See Comment 2)
- ii. See Appendix C for plantwide NO_x monitoring and record keeping requirements.

e. **PM**

The owner or operator shall demonstrate compliance with the PM emission standard for Emission Point E48 in S1.e by by keeping records from engine manufacturer indicating compliance with the standards. (See Comment 2)

f. **Opacity**

For Emission Point E48:

- i. The owner or operator shall conduct a one-minute visible emissions survey, during normal operation, of the emission point during all PMI events. A survey is required to be performed at least quarterly. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, quarterly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

g. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases
- iii. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. **Reporting (Regulation 2.16, section 4.1.9.3)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period.

All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 4)

a. **VOC**

There are no compliance reporting requirements for this equipment.

b. **HAP**

i. For Emission Point E48, the owner or operator shall include the following in the semi-annual compliance reports:

- 1) Emission Unit/Point ID number.
- 2) The beginning and ending date of the reporting period.
- 3) The calendar month and calendar year generator operation hours for each month in the reporting period for each unit.
- 4) Identification and description of all periods of deviations from the permit requirements.
- 5) If no deviations from permit requirements occur during a reporting period, the owner or operator shall submit a negative declaration stating that no permit deviations occurred during the reporting period.
- 6) If an engine is operating during an emergency and it is not possible to shut it down in order to perform the management practice requirements on the schedule required in Table 2d of 40 CFR 63 Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable and any failure to perform the management practice on the schedule required and the law under which the risk was deemed unacceptable must be reported.

ii. See Appendix A for plantwide HAP reporting requirements.

c. **Unit Operation**

For emission point E48, see Specific Condition 3.b.i.3).

d. **NO_x**

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance reports for Emission Point E48:
 - 1) Emission Unit/Point ID number.
 - 2) The beginning and ending date of the reporting period.
 - 3) The total NO_x emissions for each month in the reporting period and the consecutive 12 month total.
- ii. See Appendix C for plantwide NO_x reporting requirements.

e. **PM**

There are no routine reporting requirements for this equipment.

f. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance reports for Emission Point E48:

- i. Emission Unit ID number and Stack ID number.
- ii. The beginning and ending date of the reporting period.
- iii. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.
- iv. The date, time, and results of each Method 9. If no Method 9 were performed during the reporting period, the owner or operator may submit a negative declaration.
- v. Description of any corrective action taken pursuant to S2.f.ii.

g. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii
- iv. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. For storage vessels E6, E7, E26, and E27, Regulations 7.12 and 40 CFR Part 60 Subpart Kb apply due to the size of the tanks, but, since the vapor pressure as stored is less than 1.5 psia there are no applicable standards in either regulation. (Regulation 7.12 alone applies to storage vessels E8 and E9.)
2. The company submitted a copy of the certification from the engine manufacturer verifying that the engine meets the emission standards to the District on November 29, 2012.
3. The District determined on November 2, 2012 that the TAC compounds in this emission unit are de minimis.
4. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U5 Emission Unit Description: Fuel Dispensing**U5 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
6.40	Standards of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery and Control)	1, 2, 3, 5, & 6
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, & 3
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	1, 2, 3, & 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	63.11115, 63.11116, 63.11117, 63.11118, 63.11120, 63.11126, 63.11131, & 63.11132

District Enforceable Regulations		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U5 Equipment:

U5 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E10	WFF Gas Tank (12,000 gal). Installed: 1993.	5.00	See S1.c	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.15	See S1.a.ii		
		40 CFR 63 Subpart CCCCCC	See S1.b		
E11	Shuttle Diesel Tank (12,000 gal). Installed: 1993.	5.00	See S1.c	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.12	See S1.a.iii		
E12	Grade Lane Hub Gas Tank (12,000 gal). Installed: 1993.	5.00	See S1.c	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		7.15	See S1.a.ii		
		40 CFR 63 Subpart CCCCCC	See S1.b		
E14	309.7 gal/hr Fuel Dispensing Operation (Gas). Installed: 1993.	5.00	See S1.c	N/A	Fugitive
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
		6.40	See S1.a.i		
		40 CFR 63 Subpart CCCCCC	See S1.b		

U5 Control Devices:

There are no control devices associated with this unit.

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)**a. VOC**

- i. For Emission Point E14, while Regulation 6.40 is in effect: (See Comment 1)
 - 1) No owner or operator of an existing gasoline dispensing facility and or any new or modified facility shall install, permit the use of, or allow the transfer of gasoline from a gasoline dispensing unit to a motor vehicle fuel tank or container, unless the facility is equipped with a CARB-certified system complying with this regulation. (Regulation 6.40, section 3.1)
 - 2) All systems shall be maintained in good working order in accordance with the manufacturer's plans, specifications, maintenance requirements, and CARB certification. (Regulation 6.40, section 3.2)
 - 3) No elements or components of a Stage II shall be modified, removed, replaced, or otherwise rendered inoperative in a manner that would prevent the system from performing in accordance with its certification requirements. (Regulation 6.40, section 3.3)
 - 4) An owner or operator having a vapor recovery and control system installed in a gasoline dispensing facility shall ensure that at least one person, designated as a representative for that facility, receives adequate training and instruction in the operation and maintenance of the certified vapor recovery and control system. Training and instruction shall include: (Regulation 6.40, section 3.6.1)
 - (a) How the installed vapor recovery and control system operates and what it is designed to do;
 - (b) How to conduct daily start-up and shut-down of the vapor recovery and control system, including how to conduct daily inspections of the equipment;
 - (c) How to avoid causing the defects described in Specific Condition S1.a.i.9)(a);
 - (d) How to recognize when faulty equipment should be repaired or replaced, including the need to prevent voiding an equipment warranty; and

- (e) When equipment must be tagged as required by Specific Condition S1.a.i.9)(b), S1.a.i.9)(c), and S1.a.i.9)(d).
- 5) An owner or operator having a vapor recovery and control system shall ensure that at least once during every 24 hour period for which the system was in operation during that day a trained representative, designated for that affected facility, must visually inspect the equipment for defects. An inspection report shall be made every 24 hours recording deficiencies, repairs or maintenance on the vapor recovery and control system. This 24 hour inspection cycle is subject to audit by the District. The inspection reports must be recorded in a nonfalsifiable format that can be verified by the District. The Record keeping shall be made available to the District within three days, upon request. (Regulation 6.40, section 3.7)
- 6) *Stage II Certification Requirements:*

It shall be the responsibility of the supplier/manufacturer to provide proof to the District that the vapor recovery and control system or modifications meet certification. The vapor recovery and control system must be a certified CARB system, which has been previously tested and approved by CARB, having been assigned an executive order and a vapor recovery or removal efficiency of at least 95% by weight of gasoline vapors displaced during the dispensing of gasoline. (Regulation 6.40, section 3.4)
- 7) *Stage II System Equipment Requirements:*
 - (a) Only equipment that shall be used in a certified vapor recovery and control system is equipment which conforms with the certification for that system. (Regulation 6.40, section 3.4.1)
 - (b) Only coaxial nozzles and hoses shall be installed on balance systems to dispense gasoline and recover the gasoline vapor. (Regulation 6.40, section 3.4.3)
 - (c) Vapor risers, for balance systems and balanced assist systems, shall be one inch inside diameter galvanized pipe or larger if two or more nozzles feed into them. (Regulation 6.40, section 3.4.4)
 - (d) All rubber hosed vapor connectors (riser-to-dispenser) shall be UL approved for gasoline transmission. (Regulation 6.40, section 3.4.5)

- (e) Only equipment manufactured or rebuilt by the original manufacturer or rebuilder certified by CARB may be used in the vapor recovery and control system. The certified equipment shall be identified with the name of the certified manufacturer or certified rebuilder permanently affixed to it. (Regulation 6.40, sections 3.4.1 and 3.4.2)
- (f) Any assist system using a processing unit shall be installed in a safe and accessible location for compliance inspections. (Regulation 6.40, section 3.4.6)
- (g) No remote vapor check valves or associated equipment shall be used for operating equipment on any vapor balance recovery or Hirt vacuum assist systems. (Regulation 6.40, section 3.4.7)

8) *Equipment Maintenance:*

- (a) The vapor recovery and control system shall be kept operating in accordance with the manufacturer's specifications and maintained to be leak free, vapor tight, and in good working order. The equipment shall be operated and maintained with none of the following defects: (Regulation 6.40, sections 3.4.8 and 3.4.9)
 - (i) Absence or disconnection of any component required to be used in the system as certified by CARB, (Regulation 6.40, section 3.4.9.1)
 - (ii) A vapor hose which is crimped or flattened in any manner that will constrict the flow of vapors in the vapor return line and/or a vapor hose which has cuts, tears, and/or disconnection of inner spring from hose end fitting. The pressure drop through the vapor hose shall not exceed by a factor of two or more the value specified for that certified system, (Regulation 6.40, section 3.4.9.2)
 - (iii) A nozzle with a boot that is cut, torn, or damaged, (Regulation 6.40, section 3.4.9.3.1)
 - (iv) A nozzle with a boot or fireplate that cannot achieve a seal, (Regulation 6.40, section 3.4.9.3.2)
 - (v) A nozzle with a malfunctioning nozzle shut-off mechanism, (Regulation 6.40, section 3.4.9.3.3)

- (vi) A nozzle with a leak, a bent or loose spout, or a clogged vapor port on the spout. (Regulation 6.40, section 3.4.9.3.4)
- (vii) A vapor return line, including such components as swivels, anti-recirculation valves and underground piping, that malfunction or are blocked, cracked, crimped, trapped or are restricted such that the pressure drop through the line exceeds by a factor of two or more the value specified in that certified system, (Regulation 6.40, section 3.4.9.4)
- (viii) A vapor processing device which is inoperative or malfunctioning, (Regulation 6.40, section 3.4.9.5)
- (ix) A vacuum producing device which is inoperative or malfunctioning, (Regulation 6.40, section 3.4.9.6)
- (x) Pressure/vacuum relief valves, vapor check valves, or dry brakes which are inoperative, (Regulation 6.40, section 3.4.9.7)
- (xi) Any equipment defect which is identified in a CARB system certification as substantially impairing the effectiveness of the system in reducing the emission of air contaminants, (Regulation 6.40, section 3.4.9.8)
- (xii) The owner or operator of each gasoline dispensing facility, subject to section 1.1, shall conspicuously post operating instructions on the front of each gasoline dispenser connected to the stage II vapor recovery and control system. A toll-free telephone number shall be posted for the public to report any problems experienced with the system. The instructions shall be clearly visible to the public at any normal refueling position and be in good repair at all times. The instructions shall also clearly describe how to refuel vehicles correctly with the vapor recovery nozzles and include a warning to not attempt continued refueling after automatic shut-off of the system (an indication that the vehicle fuel tank is full). (Regulation 6.40, sections 3.8.1 and 3.8.2)

- (b) Upon identification of any defects described in Specific Condition S1.a.i.9)(a), the owner or operator shall ensure that all gasoline dispensing equipment for which vapor recovery has been impaired must be tagged "Out of Service". The tagged equipment shall be rendered inoperable and the tags shall not be removed until the defective equipment has been repaired, replaced or adjusted to permit proper operation. (Regulation 6.40, section 3.5.1)
 - (c) In the case of defects identified by the District, tagged equipment shall be rendered inoperable and the tags shall not be removed until:
 - (i) The District has been notified of the repairs, and (Regulation 6.40, section 3.5.2.1)
 - (ii) The tagged equipment has been inspected and/or the District has authorized its use pending re-inspection. (Regulation 6.40, section 3.5.2.2)
 - (d) If a District inspector determines that a component is not in good working order, but does not contain a defect pursuant to Specific Condition S1.a.i.9)(a), the District shall provide the owner or operator with a notice specifying the basis on which the component is not in good working order. If within 15 days the owner or operator provides the District with adequate evidence that the component is in good working order, the owner or operator shall not be considered in non-compliance under this section. (Regulation 6.40, section 3.5.3)
- ii. For Emission Points E10 and E12 (Regulation 7.15):
 - 1) The owner or operator of an affected facility shall install, maintain, and operate the following devices on the storage tanks (See Comment 2): (Regulation 7.15, section 3.1)
 - (a) Submerged fill pipe; (Regulation 7.15, section 3.1.1)
 - (b) If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank; (Regulation 7.15, section 3.1.2)
 - (c) Vent line restrictions on the affected facility; and (Regulation 7.15, section 3.1.3)

- (d) Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District. (Regulation 7.15, section 3.1.4)
- 2) The owner or operator may elect to use an alternate control system provided it can be demonstrated to the District's satisfaction to achieve an equivalent control efficiency. (Regulation 7.15, section 3.2)
- 3) The owner or operator shall not allow delivery of fuel to the storage tanks until the vapor balance system is properly connected to the transport vehicle and the affected facility. (Regulation 7.15, section 3.3)
- 4) No person shall deliver gasoline to a service station without connecting the vapor return hose between the tank of the delivery truck and the storage tank receiving the product. The vapor balance system must be operating in accordance with the manufacturer's specifications. (Regulation 7.15, section 3.4)
- 5) Opening of a truck tank hatch for the purpose of visual inspection is permitted for a period not to exceed one minute and only after pumping from that compartment has stopped for at least three minutes prior to the opening. All truck tank hatches must be closed during pumping. (Regulation 7.15, section 3.5)
- 6) Except for above ground tank filling, all lines must be gravity drained in such a manner that upon disconnect no liquid spillage would be expected. (Regulation 7.15, section 3.6)
- 7) Above ground tanks shall be equipped with dry breaks with any liquid spillage upon the line disconnect not exceeding 10 ml. (Regulation 7.15, section 3.7)
- 8) Equipment subject to this section shall be operated and maintained with no defects and: (Regulation 7.15, section 3.8)

- (a) All fill tubes shall be equipped with vapor-tight covers including gaskets, (Regulation 7.15, section 3.8.1)
- (b) All dry breaks shall have vapor-tight seals and shall be equipped with vapor-tight covers or dust covers, (Regulation 7.15, section 3.8.2)
- (c) All vapor return passages shall be operated so there can be no obstruction of vapor passage from the storage tank back to the delivery vehicle, (Regulation 7.15, section 3.8.3)
- (d) All storage tank vapor return pipes and fill pipes without dry breaks shall be equipped with vapor-tight covers including gaskets, and (Regulation 7.15, section 3.8.4)
- (e) All hoses, fittings, and couplings shall be in a vapor-tight condition. (Regulation 7.15, section 3.8.5)

iii. For Emission Points E11, E13, and E15:

The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. (Regulation 7.12, section 3.3)

b. **HAP**

i. For Emission Points E10, E12, and E14 (40 CFR 63 Subpart CCCCCC):

- 1) The owner or operator must, at all times, operate and maintain any affected source, including control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.11115(a))
- 2) The owner or operator must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following (40 CFR 63.11116(a)):
 - (a) Minimize gasoline spills;
 - (b) Clean up spills as expeditiously as practicable;
 - (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- 3) The owner or operator must comply with the requirements of 40 CFR 63 Subpart CCCCCC by January 10, 2011. (40 CFR 63.11116(c))(See Comment 3)
- 4) The owner or operator must only load gasoline into storage tanks at your facility by utilizing submerged filling, as defined in §63.11132, and as specified in paragraphs (b)(1), (b)(2), or (b)(3) of 40 CFR 63.11117. The applicable distances in paragraphs (b)(1) and (2) shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. (40 CFR 63.11117(b)):
 - (a) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.
 - (b) Submerged fill pipes not meeting the specifications of paragraphs (b)(1) or (b)(2) of 40 CFR 63.11117 are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit.
- 5) For Emission Points E12 and E14 only, the owner or operator must meet the following requirements (40 CFR 63.11118(b)):
 - (a) Install and operate a vapor balance system on your gasoline storage tanks that meets the following design criteria:
 - (i) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect.
 - (ii) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in §63.11132.
 - (iii) The vapor balance system shall be designed such that the pressure in the tank truck does not exceed 18 inches water pressure or 5.9 inches water

vacuum during product transfer.

- (iv) The vapor recovery and product adaptors, and the method of connection with the delivery elbow, shall be designed so as to prevent the over-tightening or loosening of fittings during normal delivery operations.
- (v) If a gauge well separate from the fill tube is used, it shall be provided with a submerged drop tube that extends the same distance from the bottom of the storage tank as specified in §63.11117(b).
- (vi) Liquid fill connections for all systems shall be equipped with vapor-tight caps.
- (vii) Pressure/vacuum (PV) vent valves shall be installed on the storage tank vent pipes. The pressure specifications for PV vent valves shall be: a positive pressure setting of 2.5 to 6.0 inches of water and a negative pressure setting of 6.0 to 10.0 inches of water. The total leak rate of all PV vent valves at an affected facility, including connections, shall not exceed 0.17 cubic foot per hour at a pressure of 2.0 inches of water and 0.63 cubic foot per hour at a vacuum of 4 inches of water.
- (viii) The vapor balance system shall be capable of meeting the static pressure performance requirement of the following equation:

$$P_f = 2e^{-500.887/v}$$

Where:

P_f = Minimum allowable final pressure, inches of water.

v = Total ullage affected by the test, gallons.

e = Dimensionless constant equal to approximately 2.718.

2 = The initial pressure, inches water.

- (b) If, prior to January 10, 2008, the owner or operator meets the following requirements, the source will be deemed in compliance with this subsection:
 - (i) The owner or operator operates a vapor balance system that achieves emissions reduction of at least

90 percent and uses management practices at least as stringent as those in S1.a.iii.5)(a).

- (ii) The gasoline dispensing facility is in compliance with an enforceable State, local, or tribal rule or permit that contains requirements of S1.a.iii.5)(b).

- ii. See Appendix A for plantwide HAP standards.

c. **TAC**

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)(See Comment 4)
- ii. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. **Monitoring and Record Keeping** (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

a. **VOC**

- i. For Emission Point E14: (See Comment 5)
 - 1) The owner or operator shall maintain the following records at the facility, and provide them to the District at the time of the District's request (Regulation 6.40, section 6):
 - (a) All executive orders for the Stage II system;
 - (b) Training certificates for all facility representatives;
 - (c) Maintenance and repair records for the Stage II system for the last 5 years, including type and duration of any system failures, dates of repairs and replacements, identity of parts repaired or replaced, and locations of parts repaired or replaced; and
 - (d) Daily inspection reports for the last 5 years. (Regulation 1.05, section 4)
 - 2) The owner or operator shall maintain the following records at the facility or off-site, and provide them to the District within three business days of the District's request (Regulation 6.40, section 6):

- (a) Names, addresses, and telephone numbers of companies installing Stage II system equipment, the identity of the equipment installed, and the dates of installation;
 - (b) Results of preliminary tests and compliance tests, including test dates and the names, addresses, and telephone numbers of the persons conducting the tests;
 - (c) Maintenance and repair records for the Stage II system for the last 5 years, including type and duration of any system failures, dates of repairs and replacements, identity of parts repaired or replaced, and locations of parts repaired or replaced; and
 - (d) Monthly gasoline throughput reports.
- ii. For Emission Points E11, E13, and E15:
 - 1) The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.a.iii.
 - 2) The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

b. HAP

- i. For Emission Points E10, E12, and E14:
 - 1) The owner or operator must have records available within 24 hours of a request by the Administrator to document your gasoline throughput. (40 CFR 63.11117(d))
 - 2) The owner or operator must keep records of the following (40 CFR 63.11125):

- (a) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
 - (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- 3) For Emission Points E12 and E14 only, the owner or operator must keep records of all tests performed under S4.b.ii.1) and S4.b.ii.2).
- ii. See Appendix A for plantwide HAP monitoring and record keeping requirements.

c. TAC

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- iii. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 6)

a. VOC

- i. For Emission Point E14:

There are no reporting requirements for this equipment.
- ii. For Emission Points E10 and E12:

When the owner or operator chooses to replace, add, or change any of the equipment required in Specific Condition S1.a.ii including, but not limited to, vent line restrictions, drop tubes, and submerged fill tubes, no later than ten days after installation the owner or operator shall notify the District in writing. This will not constitute a construction or reconstruction. This does not apply to routine replacement of gaskets.

- iii. For Emission Points E11, E13, and E15:

There are no compliance reporting requirements for this equipment.

b. HAP

- i. For Emission Points E10, E12, and E14:

- 1) For Emission Points E12 and E14 only, the owner or operator shall report to the Administrator (the District) the results of all volumetric efficiency tests required under S4.a.ii.2). Reports submitted under this paragraph must be submitted within 180 days of the completion of the performance testing. (40 CFR 63.11126(a))
- 2) The owner or operator shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred. (40 CFR 63.11126(b))

- ii. See Appendix A for plantwide HAP reporting requirements.

c. TAC

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or

meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)

- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.
- iv. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

S4. **Testing**

a. **VOC**

For Emission Point E14 (Regulation 6.40):

- i. The owner or operator shall notify the District in writing of a scheduled test at least 5 business days before the testing date, identifying each test to be conducted, the date and time of each test, and the name of the company that will conduct each test. The District may require a test to be rescheduled if a District representative cannot be available for the scheduled date and time. (Regulation 6.40, section 4.2)
- ii. The District may require a test to be aborted if the duration of the test is greater than 2 hours, improper test procedures are used, or sufficient tools, reference materials, test equipment, or repair parts or equipment are not available at the facility. (Regulation 6.40, section 4.3)
- iii. If the Stage II system or any of its components fails the test, the system shall be tagged as provided by Specific Condition S1.a.i.9)(b) and shall not be used for refueling until it is repaired or replaced and passes the test. (Regulation 6.40, section 4.4)
- iv. No later than 15 days after passing a test, the person conducting the test shall certify the results to the District in a written record that includes the date of the test and the results. (Regulation 6.40, section 4.5)
- v. Preliminary test:
 - 1) The owner or operator shall arrange for a Leak Test to be conducted after installing all underground piping but before installing any above-ground components. (Regulation 6.40, section 4.6.1)

- 2) If the underground components of the Stage II system pass the Leak Test, then the underground components may be covered and sealed. (Regulation 6.40, section 4.6.2)

vi. Initial compliance test:

- 1) The owner or operator shall arrange for an initial compliance test to be conducted no later than 30 days after the first date gasoline is delivered to the facility after a Stage II system has been installed (including all underground and above-ground components and associated piping). (Regulation 6.40, section 4.7.1)
- 2) The tests to be conducted shall be based on the type of the Stage II system installed. Unless the District approves eliminating a test, the initial compliance test shall include a Leak Test of the entire Stage II system, an Air-to-Liquid Ratio Test, a Dynamic Back Pressure Test, a Vapor Space Tie Test, a Liquid Removal Device Test, and a Liquid Blockage Test. (Regulation 6.40, section 4.7.2)

vii. Annual CARB test:

- 1) The owner or operator shall arrange for a CARB test to be conducted every twelve months. (Regulation 6.40, section 4.8.1)
- 2) The tests to be conducted shall be based on the type of the Stage II system installed. Unless the District approves eliminating a test, the initial compliance test shall include a Leak Test of the entire Stage II system, an Air-to-Liquid Ratio Test, a Dynamic Back Pressure Test, a Vapor Space Tie Test, a Liquid Removal Device Test, and a Liquid Blockage Test. (Regulation 6.40, section 4.8.2)

viii. Recertification test:

- 1) The owner or operator shall arrange for a recertification test to be conducted every 5 years. (Regulation 6.40, section 4.9.1)
- 2) The tests to be conducted during the recertification test shall be based on the type of the Stage II system installed. Unless the District approves eliminating a test, the recertification test shall include the same tests conducted during the initial compliance test. (Regulation 6.40, section 4.9.2)

b. **HAP**

For Emission Points E12 and E14:

- i. The owner or operator, at the time of installation of a vapor balance

system, and every 3 years thereafter, must comply with the following requirements (40 CFR 63.11120(a)):

- 1) The owner or operator must demonstrate compliance with the leak rate and cracking pressure requirements, specified in S1.a.iii.5)(a)(vii) for pressure-vacuum vent valves installed on gasoline storage tanks using one of the test methods identified below:
 - (a) California Air Resources Board Vapor Recovery Test Procedure TP-201.1E,—Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, adopted October 8, 2003, or
 - (b) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).
- 2) The owner or operator must demonstrate compliance with the static pressure performance requirement specified in S1.a.iii.5)(a)(viii) to this subpart for your vapor balance system by conducting a static pressure test on gasoline storage tanks using one of the test methods identified below:
 - (a) California Air Resources Board Vapor Recovery Test Procedure TP-201.3,—Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities, adopted April 12, 1996, and amended March 17, 1999, or
 - (b) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f) or
 - (c) Bay Area Air Quality Management District Source Test Procedure ST-30—Static Pressure Integrity Test—Underground Storage Tanks, adopted November 30, 1983, and amended December 21, 1994.
- ii. The owner or operator choosing to use a vapor balance system other than that described in Table 1 of 40 CFR 63 Subpart CCCCCC must demonstrate to the Administrator or delegated authority under paragraph §63.11131(a), the equivalency of their vapor balance system to that described in Table 1 of 40 CFR 63 Subpart CCCCCC using the procedures specified below (40 CFR 63.11120(b)):
 - 1) The owner or operator must demonstrate initial compliance by conducting an initial performance test on the vapor balance system

to demonstrate that the vapor balance system achieves 95 percent reduction using the California Air Resources Board Vapor Recovery Test Procedure TP-201.1,—Volumetric Efficiency for Phase I Vapor Recovery Systems, adopted April 12, 1996, and amended February 1, 2001, and October 8, 2003.

- 2) The owner or operator must, during the initial performance test required under S4.a.ii.2)(a), determine and document alternative acceptable values for the leak rate and cracking pressure requirements specified in item 1(g) of Table 1 of 40 CFR 63 Subpart CCCCCC and for the static pressure performance requirement in item 1(h) of Table 1.
 - 3) The owner or operator must comply with the testing requirements specified in S4.b.ii.1).
- iii. Performance tests shall be conducted for 40 CFR 63 Subpart CCCCCC under such conditions as the Administrator specifies to the owner or operator based on representative performance (i.e. performance based on normal operating conditions) of the source. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests. (40 CFR 63.11120(c))

Comments

1. Also, see Executive Order for CARB G-70-52-AM.
2. For Emission Points E11 and E13, Regulation 7.12 applies due to the size of the tanks, but, since the vapor pressure as stored is less than 1.5 psia there are no applicable standards in either regulation.
3. The source submitted notification of compliance with 40 CFR 63 Subpart CCCCCC to the District on October 31, 2010.
4. Motor vehicle fueling is de minimis for TACs per Regulation 5.21, section 2.6, therefore there are no monitoring, recordkeeping, or reporting requirements.
5. Although Regulation 6.40 requires records to be kept for 2 years, Regulation 2.16 requires records to be kept for 5 years; therefore the owner or operator must maintain records for 5 years.
6. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U6 Emission Unit Description: Grade Lane Utility Building**U6 Applicable Regulations:**

District Enforceable Regulations		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U6 Equipment:

U6 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E16	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.	5.00	See S1	N/A	S3
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E17	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.	5.00	See S1	N/A	S4
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E18	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed:	5.00	See S1	N/A	S5
		5.01			
		5.02			
		5.20			
		5.21			

U6 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
	1988.	5.22			
		5.23			
E19	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1988.	5.00	See S1	N/A	S6
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E20	2,584 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 1997.	5.00	See S1	N/A	S7
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E50	Grade Lane Fire Pump. Make: Cummins, Model: NT855F3. Installed: 1989.	5.00	See S1	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			

U6 Control Devices:

There are no control devices associated with this unit.

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)

TAC

- a. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)(See Comment 1)
- b. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. Monitoring and Record Keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

TAC

- a. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- b. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- c. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 2)

TAC

- a. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the

conditions analyzed. This includes, but is not limited to, control device upset conditions.

- b. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- c. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.iib.
- d. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. The District determined on November 2, 2012 that TAC emissions from this emission unit are de minimis.
2. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U7 Emission Unit Description: Utility Building**U7 Applicable Regulations:**

District Enforceable Regulations		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U7 Equipment:

U7 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E22	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2004.	5.00	See S1	N/A	S8
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E23	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2004.	5.00	See S1	N/A	S9
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			
E51	WFF Fire Pump. Make: Perkins, Model: YB70379. Installed: 2000.	5.00	See S1	N/A	N/A
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			

U7 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
		5.23			

U7 Control Devices:

There are no control devices associated with this unit.

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)

TAC

- a. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 1)
- b. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. Monitoring and Record keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

TAC

- a. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- b. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- c. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 2)

TAC

- a. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the

conditions analyzed. This includes, but is not limited to, control device upset conditions.

- b. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- c. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.
- d. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. The District determined on November 2, 2012 that TAC emissions from this emission unit are de minimis.
2. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U8 Emission Unit Description: GOC Building**U8 Applicable Regulations:**

District Enforceable Regulations		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U8 Equipment:

U8 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E28	2,200 Hp Low Speed/Continuous Duty Back-up Generator. Make: Caterpillar, Model: 3516 DITA. Installed: 2000.	5.00	See S1	N/A	S10
		5.01			
		5.02			
		5.20			
		5.21			
		5.22			
		5.23			

U8 Control Devices:

There are no control devices associated with this unit.

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)

TAC

- a. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 1)
- b. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. Monitoring and Record keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

TAC

- a. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- b. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- c. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 2)

TAC

- a. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.

- b. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- c. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.iib.
- d. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. The District determined on November 2, 2012 that TAC emissions from this emission unit are de minimis.
2. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

U9 Emission Unit Description: Wheel and Brake Shop**U9 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4
7.08	Standards of Performance for New Process Operations	1, 2, 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4

District Enforceable Regulations		
Regulation	Title	Applicable Sections
5.00	Standards for Toxic Air Contaminants and Hazardous Air Pollutants	1 and 2
5.01	General Provisions	1 and 2
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

U9 Equipment:

U9 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
E31	Bead Blaster with Bag Filter. Make: Blast it All, Model: 6048-9-RPJ2-3.	7.08	<20%	C11	N/A
		7.08	2.34 lbs/hr		
E32	Grinder. Make: Blanchard, Model: 11-20.	7.08	<20%	N/A	N/A
		7.08	2.34 lbs/hr		
E34	Zyglo NDT System, Model: ZL-67.	5.00	See S1.e	N/A	N/A
		5.01			
		5.02			

U9 Emission Points					
Emission Point	Description	Applicable Regulation(s)	Allowable Emission/ Equipment Standard	Control Device	Stack ID
		5.20			
		5.21			
		5.22			
		5.23			
		7.25	See S1.a.i		
E36	Shot Blast Machine with Baghouse. Make: LS Industries.	7.08	<20%	N/A	N/A
		7.08	2.34 lbs/hr		
E37	Vibradyne Deburring Machine. Make: LS Industries, Model: 4S.	7.08	<20%	N/A	N/A
		7.08	2.34 lbs/hr		
E39	Washer (Small), Make: MART, Model: CYCLONE 30.	6.18	See S1.a.iii	N/A	S13

U9 Control Devices:

Control ID	Description	Performance Indicator	Range	Stack ID
C11	Bag House	N/A	N/A	N/A

Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC**

- i. For Emission Points E34 and E2, the owner or operator shall not allow or cause VOC emissions from this equipment to equal or exceed 5 tons during any calendar year, unless modeling or a BACT is submitted and approved by the District. (See Comment 1) (Regulation 7.25, section 2.1 and 3.1)
- ii. For Emission Point E39:
 - 1) The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
 - (a) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
 - (b) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
 - (c) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
 - (d) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
 - (e) If the solvent is heated above 120°F, then one of the following control devices shall be used: (Regulation 6.18, section 4.1.5)

- (i) Freeboard with a freeboard ratio equal to or greater than 0.7, (Regulation 6.18, section 4.1.5.1)
 - (ii) Water cover, provided that the solvent is insoluble in, and heavier than, water, or (Regulation 6.18, section 4.1.5.2)
 - (iii) Another system, approved by the District, that provides equivalent control, such as a refrigerated chiller or carbon adsorber. (Regulation 6.18, section 4.1.5.3)
- (f) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
- (g) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- 2) The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
 - (a) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
 - (b) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
 - (c) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
 - (d) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
 - (e) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the

part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)

(f) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)

(g) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)

3) The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

b. **PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr each for Emission Points E31, E32, E36, and E37. (Regulation 7.08, section 3.1.2) (See Comments 2 and 3)

c. **Opacity**

For Emission Points E31, E32, E36, and E37 the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

d. **HAP**

See Appendix A for plantwide HAP standards.

e. **TAC**

i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 4)

ii. See Appendix B for standards for plantwide miscellaneous non-point sources.

S2. **Monitoring and Record Keeping** (Regulation 2.03, section 5.1)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. For Emission Points E2 and E34, the owner or operator shall calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month to demonstrate compliance with limits in S1.a.i.

- ii. For Emission Point E39:

The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

b. **PM**

- i. For Emission Points E32, E36, and E37, the owner or operator shall conduct and record monthly visible inspections of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, etc. and repair as needed.
- ii. For Emission Point E31, the owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

c. **Opacity**

- i. The owner or operator shall conduct and record monthly one-minute visible emission surveys for Emission Points E32, E36, and E37 during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

At emission points where visible emissions are observed, the owner or

operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

- ii. For Emission Points E31, see S2.b.ii.

d. **HAP**

See Appendix A for plantwide HAP monitoring and record keeping requirements.

e. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- iii. See Appendix B for monitoring and record keeping requirements for plantwide miscellaneous non-point sources.

S3. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 5)

a. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance report for Emission Point E34:

- i. Emission Unit and Emission Point ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. The monthly and twelve consecutive month VOC emissions for both emission points in this emission unit.
- iv. Any exceedances in emission limits. If none, the owner or operator shall submit a negative declaration.

- v. Identification of any deviation from monitoring and record keeping requirements. If none, the owner or operator shall submit a negative declaration.
 - vi. Identification of any noncompliant coatings used including the quantity of excess emissions; and
 - vii. Description of any corrective action taken. If no corrective action was taken during the reporting period, the owner or operator shall submit a negative declaration.
- b. **PM**
- i. For Emission Points E32, E36, and E37:

Any deviation from the requirement to record the results of each dust collector inspection.
 - ii. For Emission Point E31:
 - 1) Any deviation from the requirement to perform the required monthly visual inspections of the paint booth PM filters; and
 - 2) Any deviation from the requirement to record the results of each paint booth PM filter inspection.
 - 3) A negative declaration if there were no deviation in the reporting period.
- c. **Opacity**
- i. For Emission Points E31, E32, E36, and E37:
 - 1) Identification of the emission equipment;
 - 2) The beginning and ending date of the reporting period;
 - 3) Any deviation from the requirement to perform the required monthly visible emission survey or Method 9;
 - 4) A negative declaration if there were no deviations during the reporting period.
 - ii. For Emission Point E31, see Specific Condition S2.b.ii.
- d. **HAP**

See Appendix A for plantwide HAP compliance reporting requirements.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii
- iv. See Appendix B for reporting requirements for plantwide miscellaneous non-point sources.

Comments

1. Equipment subject to Regulation 7.25 and a plantwide 5 tpy VOC limit:

Emission Unit	Emission Point	Description
U1	E2	One (1) paint booth in hangar area. Make: Binks, Model: N/A, Installed: 2002.
U9	E34	Zyglo NDT System, Model: ZL-67.

2. A one time compliance demonstration was performed for PM on 8/13/2007 and the 2.34 lb/hr standard cannot be exceeded uncontrolled for Emission Points E31, E36, and E37.
3. A one time compliance demonstration was performed for PM on 8/13/2007 and the 2.34 lb/hr standard cannot be exceeded uncontrolled for Emission Point E32.
4. The District determined on November 2, 2012 that TAC emissions from this emission unit are de minimis.
5. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-permit Documents

There are no off-permit documents associated with this Title V permit.

Alternative Operating Scenarios

There are no alternative operating scenarios.

Source-wide HAP Speciation			
HAP	CAS No.	HAP	CAS No.
Benzene	71-43-2	Naphthalene	91-20-3
Ethyl benzene	100-41-4	Styrene	100-42-5
Hexane	110-54-3	Toluene	108-88-3
Methyl Isobutyl Ketone	108-10-1	Xylenes	1330-20-7
Methyl tert-Butyl Ether	1634-04-4		

Insignificant Activities

Equipment	Quantity	PTE (tpy)	Reg. Basis
Fuel burning equipment; 144 heaters, less than 1 MMBtu/hr capacity each	148	0.4 NO _x	Regulation 2.02, section 2.1.1
IA1 Main Employee Entrance (Bldg 25) boiler, 27 hp (0.069 MMBtu/hr)	1	0.1 NO _x	Regulation 2.02, section 2.1.1
IA1 GOC/Edgewood Guard Shack boiler, 64 hp (0.163 MMBtu/hr)	1	0.5 NO _x	Regulation 2.02, section 2.1.1
IA1 North Employee Entrance (Bldg 35) boiler, 134 hp (0.34 MMBtu/hr)	1	0.6 NO _x	Regulation 2.02, section 2.1.1
IA1 Emergency generators, Kohler, model John Deere 3029TF270, 64 hp each	3	0.5 NO _x	Regulation 2.02, section 2.1.1

Equipment	Quantity	PTE (tpy)	Reg. Basis
Lubricant and fuel oil storage, with fluids having a vapor pressure less than 10 mm Hg at 20°C	20	0.0001 VOC	Regulation 2.02, section 2.3.9.2
Brazing, soldering, or welding equipment, used for this type of metal joining operation	1	0.41 PM	Regulation 2.02, section 2.3.4
Dust collectors and fabric filters, which exhaust inside the building, with less than 1 tpy of PM	5	0.88 PM	Regulation 2.02, section 2.3.21
IA2 Non-halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent.	15	0.8 VOC	Regulation 2.02, section 2.3.22
Moveable fuel tanks with a capacity <500 gallons, which are able to be relocated on the premises.	10	0.0001 VOC	Regulation 2.02, section 2.3.23
VOC storage vessels with a capacity <250 gallons	10	0.0001 VOC	Regulation 2.02, section 2.3.24
150 gal fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity (Utility Building)	5	0.0001 VOC	Regulation 2.02, section 2.3.9.2
50 gal fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity (Ashbottom, Fuel Farm, and Auxiliary)	3	0.0001 VOC	Regulation 2.02, section 2.3.9.2
Oil-water separators in use as BMP for stormwater and wastewater permits. Exempt based on the low vapor pressure of Jet-A fuel.	16	0.0003 VOC	Regulation 7.36, section 1
Grade Lane Hub – Diesel Tank (12,000 gal)	1	0.002 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (25,000 gal)	1	0.003 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (6,500 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2

Equipment	Quantity	PTE (tpy)	Reg. Basis
Underground diesel storage tank (6,500 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2
Underground diesel storage tank (2,000 gal)	1	0.001 VOC	Regulation 2.02, section 2.3.9.2
602.5 gal/hr Fuel Dispensing Operation (Diesel).	1	0.86 VOC	Exempt from Regulation 7.22 due to fuel vapor pressure less than 1.5 psia

IA Comments

- 1) Insignificant Activities identified in District Regulation 2.02, section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 2.02, section 2, shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4
- 3) The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.
- 4) Emissions from Insignificant Activities shall be reported with the annual Emission Inventory, submitted to District on or before April 15 of the following year.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 5) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 6) The company shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.
- 7) Title V Listing of "Trivial Activities" footnote #3: "..... Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HASP metals are treated as trivial and listed separately in this appendix."

IA1 Emission Unit Description: Boiler Group**IA1 Applicable Regulations:**

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
7.06	Standard of Performance for New Indirect Heat Exchangers	1, 2, 3, & 4

IA1 Equipment:

Emission Point	Description	Applicable Regulation(s)	Control ID
E40	One (1) natural gas boiler, Main Employee Entrance (Bldg 25), 27 hp	7.06	N/A
E41	One (1) natural gas boiler, GOC/Edgewood Guard Shack, 64 hp	7.06	N/A
E52	One (1) natural gas boiler, North Employee Entrance (Bldg 35), 134 hp	7.06	N/A

IA1 Control Devices: There are no control devices associated with Emission Unit IA1.

IA1 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. SO₂**

The owner or operator shall not cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 1.0 lb/MMBtu actual total heat input for combustion of liquid and gaseous fuels for each emission point in this unit. (Regulation 7.06, section 5.1.1)

b. PM

The owner or operator shall not cause to be discharged into the atmosphere particulate matter in excess of 0.56 lb/MMBtu actual total heat input for each emission point in this unit. (Regulation 7.06, section 4.1.4)

c. Opacity

The owner or operator shall not cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20%. (Regulation 7.06, section 4.2)

S2. Monitoring and Record keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. SO₂

There are no monitoring or record keeping requirements for SO₂ compliance. (See IA1 Comment 1)

b. PM

There are no monitoring and record keeping requirements for PM compliance. (See IA1 Comment 1)

c. Opacity

There are no monitoring and record keeping requirements for this pollutant. (See IA1 Comment 2)

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID

number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11.

a. **SO₂**

There are no compliance reporting requirements for this equipment. (See IA1 Comment 1)

b. **PM**

There are no compliance reporting requirements for this equipment. (See IA1 Comment 1)

c. **Opacity**

There are no compliance reporting requirements for this equipment.

IA1 Comments

1. A one-time PM and SO₂ compliance demonstration was performed for the boilers, using AP-42 emission factors and combusting natural gas, and the emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these boilers with respect to PM and SO₂ emission limits.
2. The District has determined that using a natural gas fired boiler will inherently meet the 20% opacity standard. Therefore, the source is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.
3. Indirect heat exchangers are an affected facility as defined in Regulation 7.06, but meet the definition of insignificant activities per Regulation 2.02, section 2.1.1.
4. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.

IA2 Emission Unit Description: Cold cleaners group

IA2 Applicable Regulations:

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4

IA2 Equipment:

Emission Point	Description	Applicable Regulation(s)	Control ID
E56-E70	Fifteen (15) non-halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent.	6.18	N/A

IA2 Control Devices: There are no control devices associated with Emission Unit IA2.

IA2 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**VOC**

- a. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
 - i. The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
 - ii. The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
 - iii. A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition S1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
 - iv. If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
 - v. If the solvent is heated above 120°F, then one of the following control devices shall be used: (Regulation 6.18, section 4.1.5)
 - 1) Freeboard with a freeboard ratio equal to or greater than 0.7, (Regulation 6.18, section 4.1.5.1)
 - 2) Water cover, provided that the solvent is insoluble in, and heavier than, water, or (Regulation 6.18, section 4.1.5.2)
 - 3) Another system, approved by the District, that provides equivalent control, such as a refrigerated chiller or carbon adsorber. (Regulation 6.18, section 4.1.5.3)
 - vi. Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)

- vii. The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- b. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
 - i. Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
 - ii. The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)
 - iii. The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
 - iv. Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
 - v. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
 - vi. A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
 - vii. Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- c. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

S2. Monitoring and Record keeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

VOC

The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

- a. The name and address of the solvent supplier,
- b. The date of the purchase,
- c. The type of the solvent, and
- d. The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

S3. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11.

VOC

There are no compliance reporting requirements for this equipment.

IA2 Comments

1. Cold cleaners are an affected facility as defined in Regulation 6.18, but meet the definition of insignificant activities per Regulation 2.02, section 2.3.22.
2. Since this unit is an Insignificant Activity, Regulation 5.21 does not apply.

Appendix A - Synthetic Minor Source HAP Requirements**Specific Conditions****S1. Standards** (Regulation 2.16, section 4.1.1)**HAP**

- a. The owner or operator shall limit each single plantwide HAP emissions to less than 10 tons per 12 consecutive month period. (Regulation 2.03) (See Comment 1)
- b. The owner or operator shall limit the total plantwide HAP emissions to less than 25 tons per 12 consecutive month period (Regulation 2.03) (See Comment 1)

S2. Monitoring and Recordkeeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

HAP

The owner or operator shall monthly calculate and record the monthly and 12 consecutive month single and total HAP emissions.

S3. Reporting (Regulation 2.16, section 4.3.1)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment)

HAP

- a. Emission unit ID number and emission point ID number;
- b. The beginning and ending date of the reporting period;
- c. The monthly and 12 consecutive month emissions for each single HAP and total HAPs;
- d. Description of any corrective action taken for each exceedance.

Comment

The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

Appendix B - TAC Limits for Miscellaneous Non-Point Sources

Specific Conditions

S1. Standards (Regulation 2.16, section 4.1.1)

TAC

- a. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21)
- b. For the Miscellaneous Non-Point Sources, the owner or operator shall comply with the following emission limits: (See Comment 1) (Regulation 5.21)

TAC	Limit (lb/yr)
Cadmium	10.22
Chromium (trivalent)	4,240
Chromium (hexavalent)	1.56
Carbon tetrachloride	1,210

S2. Monitoring and Recordkeeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

TAC

- a. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- b. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.
- c. The owner or operator shall monitor and maintain the following records of each raw material that contains a TAC listed in S1.b:
 - i. The quantity (in gal) of each raw material used during each calendar month that contains cadmium, trivalent chromium, hexavalent chromium, and/or carbon tetrachloride.
 - ii. The pounds per gallon of cadmium, trivalent chromium, hexavalent chromium, and/or carbon tetrachloride in each raw material, as applied.

- iii. The total pounds of cadmium, trivalent chromium, hexavalent chromium, and/or carbon tetrachloride emitted during each calendar month.

S3. Reporting (Regulation 2.16, section 4.3.1)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment 2)

TAC

- a. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- b. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- c. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.b.
- d. For the Miscellaneous Non-Point Sources, the owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following:
 - i. The date and time of the excess emissions.
 - ii. The quantity of excess emissions.
 - iii. The cause or reason for excess emissions.
 - iv. Any corrective action taken to minimize the extent and duration of excess emissions.
 - v. Measures implemented to prevent reoccurrence of the situation that resulted in exceeding the emission limit.

Comments

1. The carcinogenic risk for all Category 1, 2, 3, and 4 TACs for all processes is below 7.5 for nonindustrial property and below 75.0 for industrial property. The following Table represents the Carcinogenic Risk or EAG_C for each Category 1 TAC based on the maximum off-site concentration predicted from the Screen3 air dispersion modeling runs. Since the maximum off-site Carcinogenic Risk meets the more stringent non-industrial R_C of < 1.0 for individual process/process equipment and the plant-wide cumulative risk is < 7.5 , the source has demonstrated compliance with the EA Goals for all Category 1 TACs. Category 2 TACs are de minimis at their potential.

Emission Point	TAC	Maximum Concentration ($\mu\text{g}/\text{m}^3$)	Risk resulting from maximum off-site concentration
E2	Cr^{6+}	8.0×10^{-5}	0.963
Miscellaneous Non-Point Sources	Cd	0.000548	0.976
	Cr^{3+}	0.228	0.045
	Cr^{6+}	0.0000827	0.996
	CCl_4	0.067	1.0
E48	Diesel PM	0.00106	0.32
Facility-wide R_C			4.25

The company is de minimis for all TACs for new and modified process or process equipment, except for diesel PM for the Caterpillar LC6 generator (E48). The risk is found to be 0.32. This is less than 3.8, which is the limit for the total R_C from all new and modified process or process equipment. The total R_C for all existing and new is 4.25, which is the less than the limit for the total R_C from all existing and new process or process equipment of 7.5.

2. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.

Appendix C - Plantwide NO_x Requirements**Specific Conditions****S1. Standards** (Regulation 2.16, section 4.1.1)**NO_x**

The owner or operator shall not allow the plantwide total emissions of NO_x to exceed 248 tons per year in order to avoid being subject to the requirements of PSD. (Regulation 2.04)

S2. Monitoring and Recordkeeping (Regulation 2.16, sections 4.1.9.1 and 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

NO_x

The owner or operator shall monthly calculate and record the monthly and 12 consecutive month single and total NO_x emissions.

S3. Reporting (Regulation 2.16, section 4.3.1)

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11. (See Comment)

NO_x

- a. Emission unit ID number and emission point ID number
- b. The beginning and ending date of the reporting period
- c. The monthly and 12 consecutive month NO_x emissions
- d. Description of any corrective action taken for each exceedance

Comment

The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.